

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

COLLINSVILLE POLICE PENSION  
BOARD INDIVIDUALLY AND ON  
BEHALF OF ALL OTHERS SIMILARLY  
SITUATED,

Plaintiffs,

v.

DISCOVERY, INC., WARNER BROS.  
DISCOVERY, INC., DAVID ZASLAV, AND  
GUNNAR WIEDENFELS,

Defendants.

Civil Action No.: 1:22-cv-08171

The Honorable Valerie E. Caproni

CLASS ACTION

TOME TODOROVSKI AND VIOLETA  
TODOROVSKI, INDIVIDUALLY AND  
ON BEHALF OF ALL OTHERS  
SIMILARLY SITUATED,

Plaintiffs,

v.

DISCOVERY, INC., WARNER BROS.  
DISCOVERY, INC., DAVID ZASLAV,  
AND GUNNAR WIEDENFELS,

Defendants.

**REPLY IN FURTHER SUPPORT OF MOTION OF THE OHIO PUBLIC EMPLOYEES  
RETIREMENT SYSTEM AND THE STATE TEACHERS RETIREMENT SYSTEM OF  
OHIO FOR APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF  
SELECTION OF LEAD COUNSEL**

The Ohio Public Employees Retirement System (“OPERS”) and the State Teachers Retirement System of Ohio (Ohio STRS) (together, the “Ohio Funds”) respectfully submit this Reply in further support of their motion for appointment as Lead Plaintiff and approval of their selection of counsel (ECF Nos. 26-28) (the “Motion”).

As of the Funds’ filing of their Opposition brief on Tuesday, December 6, 2022, five of the seven other movants for appointment as Lead Plaintiff had withdrawn their motions or filed notices that they were not contesting the Ohio Funds’ appointment. ECF Nos. 51-55. Since then, the two remaining movants, the Norfolk County Employees’ Retirement System and the Wayne County Employees’ Retirement System, also have withdrawn their motions. ECF Nos. 58-59.<sup>1</sup>

As the other movants recognized, the Ohio Funds have the largest financial interest in the relief sought by the class, and “otherwise satisfy the requirements of Rule 23 of the Federal Rules of Civil Procedure.” 15 U.S.C. § 78u-4(a)(3)(B)(iii).

For these reasons, and the reasons set forth the Ohio Funds’ initial memorandum of law in support of its Motion (ECF No. 27) and its memorandum of law in opposition the competing motions for Lead Plaintiff (ECF No. 56), the Ohio Funds respectfully request that the Court enter their proposed order (ECF No. 26-1): (i) appointing the Ohio Funds as Lead Plaintiff in the consolidated action; and (ii) approving the Ohio Funds’ selection of Grant & Eisenhofer P.A. as Lead Counsel for the class.

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<sup>1</sup> See ECF No. 51 (Tom Kimmeth); ECF No. 52 (Bruce and Lou Ann Murphy ); ECF No. 53 (Macomb County Employees’ Retirement System, City of Warren Police and Fire Retirement System, City of Warren General Employees’ Retirement System, City of Roseville Police and Fire Retirement System and City of Roseville Employees’ Retirement System); ECF No. 54 (Mississippi Public Employees’ Retirement System); ECF No. 55 (Robert Buchwald); ECF No. 58 (Norfolk County Employees’ Retirement System); and ECF No. 59 (The Wayne County Employees’ Retirement System).

Dated: New York, New York  
December 8, 2022

Respectfully submitted,

/s/ Daniel L. Berger

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